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June 7, 2005

By Facsimile to 202/219-3923

Office of General Counsel **Federal Election Commission** 999 E Street, NW Washington, D.C. 20463

Re:

MUR 5612 - Response to Amendment to Complaint on behalf of Service Employees International Union

Dear Sir or Madam:

The Service Employees International Union, AFL-CIO ("SEIU") submits this response to the further additional material submitted as an amendment to the complaint by the National Right To Work Legal Defense and Education Foundation, Inc. ("Foundation") in this matter. The additional material consists of a Supplemental Affidavit of Stefan Gleason dated May 13, 2005 together with a redacted copy of an SEIU Memorandum which Mr. Gleason states he received from a member of an SEIU Local Union.

As we have pointed out in our previous responses in this matter, under federal law union treasury funds may be used to support a variety of political activities, including many activities relating to federal elections. The additional materials submitted do not demonstrate or suggest any improper use of union treasury funds for political purposes. The complaint against SEIU should therefore be dismissed.

Sincerely,

Michael B. Trister

cc: Robert Weinberg, Esq. John S. Sullivan, Esq.